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6 UNITED STATES DISTRICT COURT
7 DISTRICT OF MASSACHUSETTS
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UNITED STATES OF AMERICA,) No. 05-cr-10175-WGY-1
v. Plaintiff,)
NADINE J. GRIFFIN,) MOTION FOR PERMISSION TO TRAVEL
Defendant.) OUTSIDE OF DISTRICT WHILE
) REMAINING ON BOND

COMES NOW the Defendant Nadine Griffin, by and through her attorney of record, and moves this honorable Court for an Order allowing Ms. Griffin to travel outside the Commonwealths of Massachusetts and New Hampshire, the judicial districts to which she is confined by order of this Court which granted Ms. Griffin to remain on bond pending sentencing in this case. In support of this motion, Ms. Griffin would show the Court the following:

1. Ms. Griffin remains on bond which secures her appearance before this Court in this matter.
2. The post trial terms per order of this Court require that Ms. Griffin not travel outside the Commonwealths of Massachusetts and New Hampshire without permission of this Court.
3. The pre-verdict terms allowed Ms. Griffin to travel in the Commonwealths of Massachusetts and New Hampshire, as well as in the State of Florida. It was only after verdict that this Court removed the travel availability to and in Florida.

Motion For Travel

- 1 -

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1 4. Ms. Griffin has previously traveled to Florida pre-verdict without incident and has
2 appeared at every matter before this Court.

3 5. Ms. Griffin's father passed away on November 30, 2006 at his home in New
4 Hampshire. This is relevant because now Ms. Griffin does not need to take care of her father
5 over the holidays.

6 6. Ms. Griffin wishes to visit her son and her sister in Florida during the Holiday
7 season. Ms. Griffin will be staying with her son, Andrew Sanchez.

8 7. Ms. Griffin seeks entry of an Order by this Court allowing her to travel outside the
9 Commonwealths of Massachusetts and New Hampshire as follows:

10 DESTINATION	11 TIME PERIOD	12 PURPOSE
Andrew Sanchez (son), 401 Rosery Rd., 13 Largo Fla. 33770; phone 727-348-5464	December 21-28	visit son and sister

14 Travel will be by Southwest Airlines. Ms. Griffin will always be available at the
15 telephone number listed, as well as by her cellular phone 727-418-9864, or her sister's home
16 phone 727-374-3151.

17 8. Ms. Griffin remains on bond and has appeared before this Court for all hearings and
18 for trial. During her prior travels, she remained in contact with pretrial services, as required.

19 9. After completing the travel noted, Ms. Griffin will remain under the terms of the
20 bond in the Commonwealths of Massachusetts and New Hampshire.

21 WHEREFORE, based on the foregoing, Ms. Griffin respectfully prays that this
22 Honorable Court, after duly considering this motion, enter an Order granting travel to Florida
23 as requested.

24 Motion For Travel

- 2 -

25 Alan S. Richey
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2 Respectfully submitted this 13th day of December, 2006.
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/s/ Alan S. Richey
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11 **CERTIFICATE OF CONFERENCE**
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13 Defense counsel spoke with Christopher Maietta regarding this motion. Mr. Maietta
14 does/does not oppose Ms. Griffin's travel to Florida.
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/s/ Alan Richey
Alan Richey

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19 **CERTIFICATE OF SERVICE**
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21 I HEREBY CERTIFY THAT the foregoing was served on counsel for the government
22 through the Court's ECF system.
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/s/ Alan Richey
Alan Richey